

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

**GLENN PAGE, INDIVIDUALLY AND
D/B/A GLENN PAGE CONSULTING,**

Plaintiff,

v.

**JIMMY CLEVELAND, INDIVIDUALLY
AND D/B/A CLEVECO CONSULTING,**

Defendant

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CIV.ACT.NO. 7:13-cv-00043-O

PLAINTIFF GLENN PAGE'S WITNESS LIST

Plaintiff Glenn Page intends to call the following witnesses:

Witnesses:

Glenn Page
c/o Brett Myers
5420 LBJ Freeway, Suite 1200
Dallas, Texas 75240
972-991-0889
972-404-0516—Facsimile

Glenn Page will testify that the parties agreed to a daily rate of \$1,750.00. This agreement made sense for Cleveland because Page also agreed to reimburse Cleveland for the additional cost of insurance and because Page agreed to assume the risk of non-payment by not expecting payment from Cleveland until Cleveland got paid from Hess. Page will testify that he did not pursue other opportunities that were available to him because the rate of \$1,750 per day was a good rate. Page will testify about the invoices that he submitted and the expenses he incurred. Page will testify about the discussions with Cleveland about the payment from Hess and Cleveland repeatedly telling Page that Hess had not paid Cleveland. Page will testify about why he did not accept the payments from Cleveland because they were for the wrong amount, and because Page was misled into believing that Cleveland had not been paid. Page will testify that to this day he has

not been paid the amounts that Cleveland does not dispute are owed to Page. Page has not been deposed. Expected duration: 60 minutes

Rita Page
c/o Brett Myers
5420 LBJ Freeway, Suite 1200
Dallas, Texas 75240
972-991-0889
972-404-0516—Facsimile

Rita Page will testify about her efforts to reach a resolution with Cleveland over the unpaid invoices, including sending emails and contacting Cleveland to obtain payment. Rita will testify that Cleveland refused to respond to any attempts by Rita to collect payment on the invoices. Rita Page has not been deposed. Expected duration: 30 minutes.

Jimmy Cleveland
c/o Kathleen Brown
1209 Bluff Street
Wichita Falls, Texas 76301
940-692-8220
Defendant

Cleveland will testify that the day rate was \$1,450.00, and that he tried to pay Page based on this rate, but Page refused payment. Jimmy Cleveland has not been deposed. Expected duration: 60 minutes.

Joe Garcia (by deposition)
Former Hess Employee
1327 Hathorn Way Drive
Houston, Texas 77094

Mr. Garcia was deposed. The deposition designations to be offered by Page are :

Page 6, ln 22 to ln. 23.
Page 54, ln. 6 to ln. 17.
Page 62, ln. 18 to ln. 21.
Page 65, ln. 2 to Page 68, ln. 21.
Page 78, ln. 9 to Page 79, ln. 6

Brett Myers
5420 LBJ Freeway, Suite 1200
Dallas, Texas 75240
972-991-0889

Mr. Myers will testify about the reasonable and necessary attorney fees incurred by Plaintiff in this case.

Respectfully submitted,
DAVID & GOODMAN,
A Professional Corporation

By: /S/ Brett L. Myers
Brett L. Myers
State Bar No. 00788101
Two Lincoln Centre
5420 LBJ Freeway, Suite 1200
Dallas, Texas 75240
972/991-0889
972/404-0516 Telecopier
bmyers@david-goodman.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was filed and served on July 15, 2014 in accordance with the ECF procedures for the United States District Court for the Northern District of Texas.

/s/ Brett Myers